

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

IN RE:)
)
MICHAEL WAYNE CRAWFORD,) Case No. 10-13604-RGM
) Chapter 11
)
Debtor.)

MOTION FOR ENTRY OF ORDER IN AID OF IMPLEMENTING CONFIRMED PLAN

COMES NOW, Michael Wayne Crawford (the “Debtor”), the post confirmation debtor herein, by undersigned counsel, and hereby files this motion for entry of order in aid of implementing his confirmed plan of reorganization (the “Motion”), and in support of his motion states that:

1. On May 3, 2010 (the “Petition Date”), the Debtor commenced his reorganization case by filing a voluntary petition under chapter 11 of the Bankruptcy Code.
2. By Order entered on February 12, 2013, the Debtor’s Second Amended Plan of Reorganization was confirmed (the “Debtor’s Plan”).
3. The Debtor’s Plan included a “Class 1a” secured claim by JP Morgan Chase Bank, N.A. (hereinafter “JP Morgan”), which claim was secured by real property located at 3707 Masthead Trail, Triangle, VA 22172 (the “Masthead Trail Claim”).
4. The Debtor’s Plan included a “Class 2” secured claim by JP Morgan, which claim was secured by real property located at 2940 Marsala Court, Woodbridge, VA 22192 (the “Marsala Court Claim”).

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5. The Debtor's Plan included a "Class 5a" secured claim by JP Morgan, which claim was secured by property located at 13171 Quade Lane, Woodbridge, VA 22193 (the "Quade Lane Claim" and along with the Masthead Trail Claim and Marsala Court Claim, the "JP Morgan Secured Claims").

6. The Debtor's Plan established the treatment of the three JP Morgan Secured Claims, including the amount of the secured claim, the interest rate and the amount of the monthly principal and interest payments on such claims.

7. Despite the Plan's guidance regarding the required treatment of the JP Morgan Secured Claims, JP Morgan began refusing to accept the Debtor's monthly payments as provided for under the Plan. JP Morgan also issued monthly statements to the Debtor indicating that the Debtor's required monthly payments were in excess of the monthly payments mandated by the Plan.

8. Based upon statements received by the Debtor, JP Morgan has also not properly applied escrows held by JP Morgan with respect to JP Morgan Secured Claims against the Debtor.

9. In order to close his Chapter 11 case, the Debtor requires the Court's assistance in implementing the Plan with respect to the JP Morgan Secured Claims. In particular, the Debtor requires entry of an order by this Court requiring JP Morgan to comply with the confirmed Plan by accepting the Plan mandated payments and properly applying escrow funds held by JP Morgan.

WHEREFORE, Michael Wayne Crawford, the Debtor herein, respectfully seeks entry of an order by this Court: (i) requiring JP Morgan Chase Bank, N.A. to accept payments for the JP Morgan Secured Claims in the amounts mandated by the Debtor's confirmed Plan; (ii) requiring JP Morgan Chase Bank, N.A. to properly account for and apply escrow funds of the Debtor held

by JP Morgan Chase Bank, N.A.; and (iii) granting such other and further relief as the Court deems just and proper.

Respectfully Submitted,

MICHAEL WAYNE CRAWFORD

By counsel.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of March, 2016, a copy of the foregoing Motion was sent by email and/or first-class mail, postage prepaid to the United States Trustee, creditors and parties in interest, all as set forth on the attached service list.

[THE SERVICE LIST IS ATTACHED TO THE ORIGINAL FILED WITH THE COURT]

/s/ Raymond R. Pring, Jr.
Raymond R. Pring, Jr.